

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

JANE DOE,

Plaintiff,

v.

SEAN COMBS, DADDY'S HOUSE  
RECORDINGS INC., CE OPCO, LLC d/b/a  
COMBS GLOBAL f/k/a COMBS  
ENTERPRISES, LLC, BAD BOY  
ENTERTAINMENT HOLDINGS, INC., BAD  
BOY PRODUCTIONS HOLDINGS, INC., BAD  
BOY BOOKS HOLDINGS, INC., BAD BOY  
RECORDS LLC, BAD BOY ENTERTAINMENT  
LLC, BAD BOY PRODUCTIONS LLC,  
ORGANIZATIONAL DOES 1-10, INDIVIDUAL  
DOES 1-10, AND SHAWN CARTER,

Defendants.

Civil Action No. 1:24-cv-07975-AT

**NOTICE OF MOTION TO DISMISS**

**(ORAL ARGUMENT REQUESTED)**

PLEASE TAKE NOTICE, that upon the accompanying Memorandum of Law in Support thereof, the Declaration of Alex Spiro, dated February 4, 2025 and all prior pleadings and proceedings herein, Shawn Carter will move this Court before the Hon. Analisa Torres, by the undersigned counsel, at the Daniel Patrick Moynihan, U.S. Courthouse, 500 Pearl St., New York, NY 10007, at a date and time to be determined by this Court, for an order dismissing Plaintiff's Amended Complaint pursuant to Rule 12(b)(6) of the Federal Rules of Civil Procedure, and for such other and further relief the Court deems just and proper.

PLEASE TAKE FURTHER NOTICE, that pursuant to the Court's Order dated January 2, 2025 (ECF 59), opposition papers, if any, shall be filed on or before February 28, 2025, and

Mr. Carter's reply in further support, if any, shall be filed by March 14, 2025.

Respectfully submitted,

**QUINN EMANUEL URQUHART  
& SULLIVAN, LLP**

Dated: New York, New York  
February 4, 2025

By: /s/ Alex Spiro  
Alex Spiro  
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*Attorney for Shawn Carter*